H1044
H4AR
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Revised PCB congener and dioxin and furan data report
Marina Mitchell
to:
Ravi Sanga
05/03/2010 03:28 PM
Cc:
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Hi Ravi,

The revised PCB congener and dioxin/furan data report for the EW SRI/FS tissue samples is attached. Please see Susie's response to EPA comments below.

Thank you,
Marina

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Please send data submittals to data@windwardenv.com

From: Susan McGroddy
Subject: Revised PCB congener and dioxin and furan data report

I have revised the PCB congener and dioxin/furan data report for the tissue samples. Here are EPA's comments and my responses. The only major changes are the tables added to Section 3.2.4.

Thanks.
Susie

Susie -- EPA has reviewed the PCB congener and dioxin data report for the tissue samples and has the following comments:

(editorial) - The headers on Tables 3-7 ad 3-9 of the data report say "minimum" on the column that contains the maximum concentration of the range. Please change these table headers.

Response: Comment addressed.

Method blanks: EPA looked at the data that were restated as undetected (qualified U) during validation because of blank contamination. Very sensitive methods such as those

for PCB congeners and dioxins can become limited by the lab's ability to keep glassware and the system clean rather than by instrument capabilities, so contamination is not uncommon. Environmental contamination is difficult to avoid at very low levels. However, all contamination must be evaluated for its effect on data usability. This issue is more significant for the furans that were found in the blanks (1,2,3,4,6,7,8-HpCDF and 1,2,3,4,7,8-HxCDF), since the affected sample concentrations contributed more to the totals and these furans contribute to the TEQ. The EWG must look at the difference in overall tissue TEQs resulting from blank contamination. This will give EPA an idea of the percentage difference in risk resulting from the error. If the risk difference is relatively low, then the issue can be discussed in the uncertainty section of the draft HHRA. If the risk difference is not as low as anticipated, then more discussion with EPA is needed regarding this issue.

Response: Tables comparing the TEQs calculated using 0, 1/2RL and full RL have been included in Section 3.2.4 to enable an assessment of the extent of this issue. The nondetected values do not have a substantial impact on the calculated TEQs.

Calibration range: According to the data validation report on page PCB Congeners-3, results for several PCB congeners exceeded the calibration range. The samples should ideally have been reanalyzed; results must be within the calibration range. More discussion is needed between the EWG and EPA regarding the qualification and usability of these data. Please contact Maja Tritt with EPAs QA office in order to discuss this further.

Response: Following additional conversations with Maja Tritt and the review of the linearity of the instrument response it was determined that results above the calibration range are acceptable as presented.